



February 5, 2021

The Honorable Jocelyn G. Boyd
Chief Clerk and Executive Director
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, South Carolina 29210

Re: Duke Energy Carolinas, LLC & Duke Energy Progress, LLC's Establishment of Solar Choice Metering Tariffs Pursuant to S.C. Code Ann. § 58-40-20, Docket Nos. 2020-264-E and 2020-265-E

Dear Ms. Boyd:

Upstate Forever writes this letter in support of the stipulation and settlement for Duke Energy's proposed new Solar Choice Net Energy Metering (NEM) tariffs. Upstate Forever is a non-profit, membership-based organization based in Greenville, South Carolina. Upstate Forever promotes sensible growth and the protection of the critical lands, waters, and unique character of Upstate South Carolina.

Upstate Forever is a party to the stipulation and settlement with Duke Energy because the proposed Solar Choice NEM tariffs comply with the directives of Act 62 (the Energy Freedom Act), legislation that we supported. The proposed new tariffs, along with the agreed-to proposal to pair rooftop solar with new energy efficiency and demand side management programs, will allow rooftop solar customers to contribute to reducing both summer and winter peaks. This innovative rate design has the potential to delay or prevent expensive grid and peaking investments that would otherwise be paid for by all ratepayers. At the same time, we are confident that Duke Energy's proposed Solar Choice NEM tariffs fairly value distributed solar energy resources and will allow continued adoption and growth in the solar market, which has been an important contributor to job creation and economic activity in the Upstate.

In rural Spartanburg County, I have observed new rooftop solar installations on humble homes and have heard anecdotal evidence that solar leasing is playing an important role in making solar an affordable resource for a broad range of customers. Upstate Forever is in favor of making rooftop solar a viable option for low and moderate income customers in South Carolina, and we support rate structures, like Duke Energy's proposed Solar Choice NEM tariffs,

that will work with a leasing model. Duke Energy's commitment to develop a Solar Choice program, including energy efficiency or demand response program, that works for low-income households is another important step towards making solar viable to these customers. Duke Energy's willingness to participate in the stakeholder process and listen to stakeholder input in developing the proposed Solar Choice NEM tariffs helped make this outcome possible.

Upstate Forever is also interested in avoiding unnecessary new natural gas infrastructure, including the building of new peaking plants. The Upstate shoulders the majority of all major pipeline infrastructure in this state, and new peaking generation would likely require yet another new pipeline accessing the Williams Transcontinental pipeline that crosses the Upstate. Further, in order to get a handle on stopping climate change, we cannot continue to rely on fossil fuels for our energy needs. Providing options for more customers to adopt rooftop solar helps avoid the need for new gas infrastructure. We are glad to support the innovative new rate design provided by Duke Energy's Solar Choice NEM tariffs that comply with the directives of Act 62—as well as the agreed-to smart thermostat energy efficiency and demand side management programs that will follow—which when combined, will encourage the smart use of energy by rooftop solar customers.

Sincerely,

A handwritten signature in blue ink that reads "Shelley Hudson Robbins". The signature is written in a cursive, flowing style.

Shelley Hudson Robbins
Energy and State Policy Director
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